


UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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SAMAD BROTHERS, INC.,)	09 CV 5843 (JFK)(KNF)
Plaintiff,)	
)	
- v -)	<u>NOTICE OF MOTION TO</u>
)	<u>COMPEL</u>
BOKARA RUG CO., INC., JAN SOLEIMANI, AND)	
GABRIEL VAKNIN,)	
)	
Defendants.)	
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PLEASE TAKE NOTICE that, upon the annexed Declaration of Joanne J. Romero, dated December 7, 2010, the exhibits annexed thereto, and the accompanying Memorandum of Law in Support, Defendants will move this court, the Honorable Nathaniel F. Fox presiding, at the United States District Courthouse, Southern District of New York, located at 500 Pearl St., New York, New York, as soon as counsel may be heard following the briefing schedule set by the Honorable Nathaniel F. Fox (signed November 30, 2010 and received by the parties via ECF on December 2, 2010), for an Order pursuant to Rules 37 of the Federal Rules of Civil Procedure, granting Defendants' motion to compel the production of documents by Plaintiff.

Dated: New York, New York
December 7, 2010

Respectfully submitted,


Jura C. Zibas (JZ 8970)
Joanne J. Romero (JR 0275)
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